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8 *Resources Group, LLC as Trustee of Teal Petals St Trust;*
and 9863 Dublin Valley, LLC

11 UNITED STATES DISTRICT COURT
12 FOR THE STATE OF NEVADA

14 *****

15 NEWREZ LLC f/k/a NEW PENN
16 FINANCIAL d/b/a SHELLPOINT
MORTGAGE SERVICING,

17 Counter-claimant,

18 vs.

19
20 TEAL PETALS ST TRUST; DOES I through
21 X, inclusive; and ROE CORPORATIONS I
through X, inclusive,

22 Counter-Defendants.

23 NEWREZ, LLC F/K/A NEW PENN
24 FINANCIAL D/B/A SHELLPOINT
25 MORTGAGE SERVICING,

26 Plaintiff,

27 vs.
28

Case No. 2:22-cv-00395-JAD-DJA

CONSOLIDATED WITH:

Case No. 2:22-cv-01839 -JAD-MDC

**STIPULATION TO EXTEND BRIEFING
SCHEDULE (THIRD REQUEST)**

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IYAD HADDAD aka EDDIE HADDAD;
RESOURCES GROUP, LLC; RESOURCES
GROUP, LLC as Trustee of TEAL PETALS
ST TRUST' 9863 DUBLIN VALLEY, LLC;
SATICOY BAY LLC dba SATICOY BAY
LLC SERIES 9863 DUBLIN VALLEY ST;
SATICOY BAY LLC SERIES 9863 DUBLIN
VALLEY ST; DOES I through X, inclusive;
and ROE CORPORATIONS I through X,
inclusive,

Defendants.

COMES NOW NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing ("Shellpoint") and Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC; Saticoy Bay, LLC d/b/a Saticoy Bay LLC 9863 Dublin Valley St.; Saticoy Bay LLC 9863 Dublin Valley St.; and Iyad Haddad aka Eddie Haddad (collectively, "Defending Parties"), and hereby stipulate as follows:

1. Pending before the Court are Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC's motions: a motion for protective order, [ECF #71]; motion to stay or bifurcate discovery [ECF #72]; and motion to extend time to respond to Shellpoint's interrogatories and requests for admissions [ECF #73]. The other three Defending Parties (Saticoy Bay, LLC d/b/a Saticoy Bay LLC 9863 Dublin Valley St.; Saticoy Bay LLC 9863 Dublin Valley St.; and Iyad Haddad aka Eddie Haddad) joined them [ECF #74-76].
2. Shellpoint and the Defending Parties previously agreed Shellpoint's responses to the above-referenced motions would be due on October 15, 2024 [ECF #85].
3. On October 15, 2024, Shellpoint opposed the Defending Parties' motions [ECF #86, 87, 88] and filed a counter-motion to compel discovery [ECF #90] and a counter-

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1 motion for a protective order [ECF #91]. Due to repeated technological issues
2 when finalizing the exhibits supporting Shellpoint's counter-motions, *see* ECF 92,
3 as well as Word crashing on Shellpoint's counsel on October 15, 2024, Shellpoint
4 filed its counter-motion for attorneys' fees and costs [ECF #93] the following day,
5 on October 16, 2024. Good cause exists for the filing of Shellpoint's counter-
6 motion for attorneys' fees and costs one day outside of the previously agreed
7 deadline, and the parties agree the counter-motion shall be deemed timely.
8

- 9 4. The motions and counter-motions referenced above are set for hearing on
10 November 25, 2024.
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12 5. The current deadline for the Defendants to reply in support of their motions and to
13 respond to Shellpoint's counter-motions is October 25, 2024.
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15 6. The parties are currently discussing the terms of Shellpoint's proposed stipulated
16 protective order for submission to this Court, which would limit the issues before
17 the Court at the hearing on November 25, 2024.
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19 7. Preparing and filing replies and responses to the counter-motions has taken longer
20 than expected due to other work obligations and various other factors.

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8. The parties stipulate and agree that Defendants shall have an extension of time until Monday, October 28, 2024, to file any above-described replies or responses that have not yet been filed.

9. This stipulation is made in good faith and not for purpose of delay.

DATED this 25th day of October, 2024.

AKERMAN LLP <u>/s/ Paige L. Magaster</u> ARIEL STERN, ESQ. Nevada Bar No. 8276 NATALIE L. WINSLOW, ESQ. Nevada Bar No. 12125 PAIGE L. MAGASTER, ESQ. Nevada Bar No. 15557 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorneys for NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing</i>	ROGER P. CROTEAU & ASSOCIATES, LTD. <u>/s/ Timothy E. Rhoda</u> ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 2810 W. Charleston Boulevard, Suite 67 Las Vegas, NV 89102 <i>Attorneys for Defendants Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC</i>
LAW OFFICES OF MICHAEL F. BOHN, ESQ. LTD. <u>/s/ Michael F. Bohn</u> MICHAEL F. BOHN, ESQ. Nevada Bar No. 1641 2260 Corporate Circle, Suite 480 Henderson, NV 89074 <i>Attorney for Defendants Saticoy Bay LLC; Saticoy Bay LLC 9863 Dublin Valley St. and Iyad Haddad</i>	

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 10/28/2024